

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

No. 4:20CR00107

Judge: Mazzant

v.

ANITA MOODY

DEFENDANT ANITA MOODY'S MOTION FOR LEAVE TO FILE OBJECTIONS AND
RESPONSES TO THE PRE-SENTENCE INVESTIGATION REPORT

COMES NOW ANITA MOODY, DEFENDANT, in the above cause and files this her
Motion for Leave to File Objections and Responses to The Pre-Sentence Investigation Report and
would respectfully show unto the Court as follows:

I.

This case was originally set for sentencing on October 1, 2020. At that time, the Court advised the Defendant and Counsel that it was reluctant to follow the existing plea agreement reached with the United States Attorney's Office. The Court, on oral motion from Defense Counsel, agreed to allow the Defendant until December 4, 2020, to respond to the Pre Sentence Investigation Report with objections and responses. The Court further requested that this Motion for Leave be filed coincident and prior to the filing of Objections and Responses. The Defendant now files this Motion in accordance with the Court's directive, and seeks leave to file Objections to the Pre-Sentence Investigation Report, and in particular the Sentencing Guideline Range of Punishment, together with a Sentencing Memorandum and Motion for Downward Departure and/or Variance.

II.

Wherefore, Premises Considered, the Defendant, Anita Moody, respectfully requests that this Court grant the requested relief and give Leave to the Defendant and her Counsel to File her Objections and Responses to the Pre-Sentence Investigation Report and for such other and further relief as to which she may be entitled.

Respectfully submitted,

Smith McDowell Ginn
P.O. Box 493
Sulphur Springs, TX 75483
Telephone: 903-885-3116
Facsimile: 903-885-7549



John C. Ginn, Attorney for the Defendant
State Bar No.: 07966900
jcginn@easttexaslaw.com

CERTIFICATE OF SERVICE

I certify that on November 24, 2020, the foregoing Response To The Pre-Sentence Investigation Report has been forwarded by electronic filing to Maureen Smith, Assistant United States Attorney and Keith Wallace, United States Probation Department by electronic means.



John C. Ginn

CERTIFICATE OF CONFERENCE AND VERIFICATION THAT
THIS MOTION IS UNOPPOSED

I hereby certify that I have communicated with the Assistant United States Attorney, Maureen Smith, on November 23, 2020, and that this Motion For Leave is Unopposed.



John C. Ginn